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2012 AUG 31 PM 3:46

THOMAS M. GOULD  
CLERK, U.S. DISTRICT COURT  
W.D. OF TN MEMPHISIN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

SHERYL TAYLOR,	)	CIVIL ACTION NO. 2:11-cv-3087-STA-dkv
Plaintiff	)	
KARLA DAVIS, ET AL.,	)	
Defendants	)	


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PLAINTIFF'S MOTION TO RECUSE WARREN JASPER FROM THIS CIVIL ACTION

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COMES NOW, pursuant to Federal Rules of Civil Procedure, the Plaintiff respectfully moves this Court to recuse Warren A. Jasper from this civil action. Rule 1.7(a) of the ABA Model Rules of Professional Conduct. Warren A. Jasper has violated the ethical conduct of lawyers. Plaintiff moves this Court for a hearing on this issue. Warren A. Jasper is the entity that denied the Plaintiff a hearing before the Tennessee Department of Labor and Workforce Development. All federal employees have a right to hearing before all administrative agencies seeking a relief under the Unemployment Compensation for Federal Employees (UCFE) Unemployment Insurance (UI) Program. The Plaintiff was denied a hearing before the Board of Review (BOR) and the Commissioner's Designee before the Tennessee Department of Labor and the Workforce Development which is a violation of federal laws.

Respectfully submitted,



Sheryl Taylor  
PO Box 897  
Memphis, TN 38101

CERTIFICATE OF CONSULTATION

1. Attached certified letter # 7011 3500 0000 0761 0975 and fax sent to attorney Warren A. Jasper and certified letter # 7011 3500 0000 0761 0982 attorney Harriett Halmon on August 14, 2012 and August 28, 2012. See Exhibit 1.
2. Warren A. Jasper did not respond the Plaintiff.
3. Federal Rules of Civil Procedure & ABA Professional Conduct Rules.

CERTIFICATE OF SERVICE

I, Sheryl Taylor, do hereby certify that a copy of the foregoing Plaintiffs' Motion to Recuse Warren A. Jasper has been mailed, first class, postage prepaid, on August 31, 2012 to:

Warren A. Jasper  
State of Tennessee  
General Civil Division  
425 5<sup>th</sup> Avenue North  
Nashville TN 37243  
PO Box 20207  
Nashville TN 37202

Harriett Miller Halmon  
167 North Main, Ste 800  
Memphis, TN 38103

  
Sheryl Taylor

## Message Confirmation Report

AUG-14-2012 04:16 PM TUE

Fax Number :  
Name :

Name/Number : 16157412009  
Page : 1  
Start Time : AUG-14-2012 04:16PM TUE  
Elapsed Time : 00'16"  
Mode : STD ECM  
Results : [O.K.]

## EXHIBIT 1

August 14, 2012

United States Attorney Office  
Attn: Harriett Halmon  
167 North Main, Ste 800  
Memphis TN 38103  
Fax: 901-544-4230  
RE: 11 cv 3087

State of Tennessee  
Attorney General and Reporter  
General Civil Division  
Attn: Warren A. Jasper  
425 5<sup>th</sup> Avenue North  
Nashville, TN 37243  
PO Box 20207  
Nashville, TN 37202  
Fax: 615-741-2009

Dear Harriett Halmon and Warren A. Jasper:

I seek an unopposed motion for Warren A. Jasper to recuse himself from this civil action. There is a conflict of interest. Warren A. Jasper is an entity that denied my petition for a hearing before the Board of Review. Warren A. Jasper has a relationship with the federal government in this civil action.

I would like a written response as soon as possible.

Sincerely,  
*Sheryl Taylor*  
Sheryl Taylor

U.S. Postal Service<sup>TM</sup>  
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NASHVILLE TN 37243

Postage	\$ 40.45	0980
Certified Fee	\$2.95	09
Return Receipt Fee (Endorsement Required)	\$0.00	Postmark Here
Restricted Delivery Fee (Endorsement Required)	\$0.00	
Total Postage & Fees	\$ 43.40	08/14/2012

Sent To *State of TN*  
Street, Apt. No.,  
or PO Box No. *425 5th Ave North*  
City, State, ZIP+4 *Nashville, TN 37243*

PS Form 3800, August 2006

See Reverse for Instructions

7011 3500 0000 0760 8408

# Message Confirmation Report

AUG-14-2012 04:18 PM TUE

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Name :

Name/Number : 9015444230  
Page : 1  
Start Time : AUG-14-2012 04:18PM TUE  
Elapsed Time : 00'12"  
Mode : STD ECM  
Results : [O.K.]

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August 14, 2012

United States Attorney Office  
Attn: Harriett Halmon  
167 North Main, Ste 800  
Memphis TN 38103  
Fax: 901-544-4230  
RE: 11 cv 3087

State of Tennessee  
Attorney General and Reporter  
General Civil Division  
Attn: Warren A. Jasper  
425 5<sup>th</sup> Avenue North  
Nashville, TN 37243  
PO Box 20207  
Nashville, TN 37202  
Fax: 615-741-2009

Dear Harriett Halmon and Warren A. Jasper:

I seek an unopposed motion for Warren A. Jasper to recuse himself from this civil action. There is a conflict of interest. Warren A. Jasper is an entity that denied my petition for a hearing before the Board of Review. Warren A. Jasper has a relationship with the federal government in this civil action.

I would like a written response as soon as possible.

Sincerely,  
  
Sheryl Taylor

### UNITED STATES POSTAL SERVICE® Certificate Of Mailing

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From: MS. Taylor  
PO Box 892  
Memphis TN 38103  
Aug 14 2012

To: US Atty OGC  
Attn: Harriett Halmon  
167 N. Main Ste. 800  
Memphis TN 38103

U.S. POSTAGE  
PAID  
MEMPHIS, TN  
38130  
AUG 14 12  
AMOUNT  
**\$1.15**  
00038938-09



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## Message Confirmation Report

AUG-28-2012 12:51 PM TUE

Fax Number :  
Name :

Number : 16157412009  
 : 1  
 Time : AUG-28-2012 12:50PM TUE  
 ad Time : 00'12"  
 : STD ECM  
 ts : [O.K.]

EXHIBIT 1

August 28, 2012

United States Attorney Office  
 Attn: Harriett Halmon  
 167 North Main, Ste 800  
 Memphis TN 38103  
 Fax: 901-544-4230  
 RE: 11 cv 3087

\*\*\*AMENDED LETTER\*\*\*

State of Tennessee  
 Attorney General and Reporter  
 General Civil Division  
 Attn: Warren A. Jasper  
 425 5<sup>th</sup> Avenue North  
 Nashville, TN 37243  
 PO Box 20207  
 Nashville, TN 37202  
 Fax: 615-741-2009

Dear Harriett Halmon and Warren A. Jasper:

I am consulting with Warren A. Jasper to have Warren A. Jasper recuse himself from civil action 11cv 3087. There is a conflict of interest for Warren A. Jasper to continue as legal counsel for civil action 11 cv 3087. I am consulting with Warren A. Jasper because I would like to file an unopposed motion for Warren A. Jasper to remove or recuse himself from civil action 11 cv 3087. However, I am consulting with all defendants on this unopposed motion. I am without legal counsel and I am unsure if I am required to contact Attorney Harriet Halmon.

In addition, I am consulting with attorney Harriett Halmon for an unopposed motion for Harriet Halmon to recuse or remove herself from civil action 11 cv 3087. It is a conflict of interest for Harriet Halmon to participate as legal counsel in civil action 11 cv 3087.

I would like a response as soon as possible. My mailing address is PO Box 897 Memphis TN 38101.

Sincerely,

  
 Sheryl Taylor

U.S. Postal Service™	
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For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>	
NASHVILLE TN 37243	
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Certified Fee	\$2.95
Return Receipt Fee (Endorsement Required)	\$0.00
Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$3.40
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08/28/2012	
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Street, Apt. No., or PO Box No. 425 5th Ave. North	
City, State, ZIP+4 Nashville, TN 37243	
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## Message Confirmation Report

AUG-28-2012 12:53 PM TUE

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Name :

Name/Number : 9015444230  
 Page : 1  
 Start Time : AUG-28-2012 12:52PM TUE  
 Elapsed Time : 00'18"  
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 Results : [O.K.]

EXHIBIT 1

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For delivery information visit our website at <a href="http://www.usps.com">www.usps.com</a>	
OFFICIAL USE	
Postage	\$ 0.45
Certified Fee	\$2.95
Return Receipt Fee (Endorsement Required)	\$0.00
Restricted Delivery Fee (Endorsement Required)	\$0.00
Total Postage & Fees	\$ 3.40
Sent To	US Atty Ofc
Street, Apt. No., or PO Box No.	167 N. Main St-800
City, State, ZIP+4	Memphis TN 38103
PS Form 3800, August 2006	
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August 28, 2012

United States Attorney Office  
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 167 North Main, Ste 800  
 Memphis TN 38103  
 Fax: 901-544-4230  
 RE: 11 cv 3087

\*\*\*AMENDED LETTER\*\*\*

State of Tennessee  
 Attorney General and Reporter  
 General Civil Division  
 Attn: Warren A. Jasper  
 425 5th Avenue North  
 Nashville, TN 37243  
 PO Box 20207  
 Nashville, TN 37202  
 Fax: 615-741-2009

Dear Harriett Halmon and Warren A. Jasper:

I am consulting with Warren A. Jasper to have Warren A. Jasper recuse himself from civil action 11cv 3087. There is a conflict of interest for Warren A. Jasper to continue as legal counsel for civil action 11 cv 3087. I am consulting with Warren A. Jasper because I would like to file an unopposed motion for Warren A. Jasper to remove or recuse himself from civil action 11 cv 3087. However, I am consulting with all defendants on this unopposed motion. I am without legal counsel and I am unsure if I am required to contact Attorney Harriet Halmon.

In addition, I am consulting with attorney Harriett Halmon for an unopposed motion for Harriet Halmon to recuse or remove herself from civil action 11 cv 3087. It is a conflict of interest for Harriet Halmon to participate as legal counsel in civil action 11 cv 3087.

I would like a response as soon as possible. My mailing address is PO Box 897 Memphis TN 38101.

Sincerely,  
  
 Sheryl Taylor